



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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000005945

Ref 8HWM-FF

Mr Frazer Lockhart
Department of Energy
Trailer 130A
P.O Box 928
Golden, CO 80402

ADMIN RECORD

Dear Mr. Lockhart:

As a followup to the meeting on January 10, 1991 between representatives from EPA and the Department of Energy (DOE) regarding the Draft Past Remedy Report for OU-3, following is EPA's understanding of the agreements reached during that meeting:

a. The analytical data that exists for the areas considered in the report has been reviewed by EPA. It was agreed that the data is of unknown quality and comparability. While consideration of the data may be useful in developing a site conceptual model and a remedial investigation workplan, it should not be considered for exposure point concentrations in a quantitative risk assessment. In lieu of using this data to determine exposure point concentrations, the final Past Remedy Report will instead include an evaluation of the data using the six criteria contained in the EPA guidance document "Guidance for Data Useability in Risk Assessment" (EPA/540/G-90/008). It was also agreed that the data sources will be included as an appendix to the final document.

b. Figure 3-1 will be revised to reflect a consistent use of the terms "release mechanism" and "transport media" and to illustrate a consideration of all possible contaminant releases (Refer to Exhibit 6-3 in the "Risk Assessment Guidance for Superfund, Volume I, Human Health Evaluation Manual" (EPA/540/1-89/002) for guidance on common release sources at hazardous waste sites). DOE will consider the suggested revision of Figure 3-1 which EPA provided at the January 10, 1991 meeting for inclusion in the final Past Remedy Report.

c. The final Remedy Report will include a discussion of other potential contaminants of concern. The discussion at the meeting was focused on americium in particular. It was agreed that a toxicity assessment for americium will be included in the final Remedy Report in order to give the reader information regarding the potential for americium to cause adverse health effects in exposed individuals and to provide an estimate of the relationship between the extent of exposure and the increased likelihood of adverse effects.

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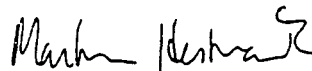
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d. The final Remedy Report will include a consideration of all potential exposure pathways (including the ingestion pathway) with an indication that all pathways will be further examined quantitatively during the Remedial Investigation. It was agreed that the low gastrointestinal absorption rate of insoluble plutonium may not be a justifiable basis for excluding the ingestion pathway and that without data on relative intake rates from the inhalation and ingestion pathways, it is not possible to estimate relative risks due to these exposure routes even on a qualitative basis.

e. It is EPA's understanding that DOE will consider including in the final Remedy Report a calculation of the risk resulting from exposure to various soil concentrations using standard EPA exposure assumptions for a residential use scenario.

Specific written comments regarding the OU-3 draft Past Remedy Report will be forwarded to DOE in accordance with the schedule contained in the draft Interagency Agreement (IAG). The technical exchanges which have taken place throughout the review and comment period for this deliverable have been productive towards producing a document which fulfills the requirements of the draft IAG. We suggest that the appropriate technical representatives from EPA, the State of Colorado, DOE, EG&G, and its contractors continue to meet on a regular basis throughout the scoping process and the Remedial Investigation to continue this progress. Our point of contact for OU-3 is Ms. Bonnie Lavelle, (303)294-1165.

Sincerely,



• Martin Hestmark,
Rocky Flats Project

cc Bob Birk, DOE/RFP
Michael Guilleam, EG&G/RFP
Gary Baughman, CDH